

REMARKS/ARGUMENTS

Claims 1-10 are now pending in the instant application.

In the most recent Office Action claims 1-8 are rejected under 35 U.S.C. § 112, second paragraph, as allegedly indefinite. Claims 1-3 and 6 are rejected under 35 U.S.C. § 102(b) as allegedly anticipated by US Patent No. 4,833,661 to Kim (“Kim”). Claims 4-5 and 7-8 are rejected under 35 U.S.C. § 103(a) as allegedly obvious over Kim in view of US Patent No. 5,323,363 to Hysek, *et al.* (“Hysek”). The specification is also objected to for alleged informalities.

As amended above page 8 of the specification corrects an editorial oversight with respect to certain reference numerals of the figures. More broadly, applicant’s detailed reading of the specification reveals no instances of non-idiomatic English which would impair the understanding of the present invention to one skilled in the relevant art. If the Examiner can cite to any instances in the present specification, applicant would happily correct them. However, applicant kindly requests favorable reconsideration and withdrawal of the objection.

Turning to the rejections under Section 112, second paragraph, as amended above the claims are revised primarily for form to place them in typical style for U.S. practice. Additionally, claim 1 replaces the term “jumbled sequence” with - - non-sequential pattern - - to address the Examiner’s rejection. The subject matter of claim 2 has been divided amongst claim 2 as amended and new claims 9 and 10, dependent from claim 2. The recitation of 31 successive positions has been corrected to recite 13 successive positions, consistent with the specification as originally filed. Claim 6 is amended to recite the Markush group in more typical form. Claim 8 is amended to explicitly recite the first and second racks of the control mechanism. The claim term “as it drops” objected to by the Examiner has been removed as superfluous. No new matter has been added by these amendments.

Turning to the applied references, applicant respectfully traverses the rejections for at least the following reasons. The sole independent claim 1 recites an analog display device for a timepiece comprising, *inter alia*, a dial having a non-sequential pattern of values to be displayed, wherein successive values to be displayed on the dial are offset by regular intervals of a certain

number of successive positions. The Office Action alleges that these features are taught by Kim. Applicant respectfully disagrees.

In contrast to the claimed invention, Kim discloses a timepiece with random numbered dial wherein successive values are distributed around the dial randomly without any regular interval between successive values to be displayed. For example, referring to Fig. 1 of Kim, numerals 1 and 2 are separated by three (or alternately 9) successive positions while numerals 2 and 3 are separated by five (alternately 7) successive positions. Without needing to go further it is clear that Kim does not disclose successive values are offset by regular intervals on the dial. Because of this arrangement of Kim, it is disclosed that an independent motor is required to drive each of the second minute and hour hands of the watch. See Fig. 3. Each independent motor requires electronic control and a lookup table to determine the associated position of a given number on the dial. See column 4, lines 10-15. This implementation of Kim in itself is overly complex and expensive. Moreover, an equivalent mechanical implementation would be itself large, complex, and inordinately expensive. On the other hand, the display device as recited in the present claims having regular intervals between successive values can be implemented simply and elegantly.

Therefore, applicant respectfully submits that claim 1 is patentably distinguished over Kim. The proposed combination with Hysek is premised upon the application of Kim to claim 1. Hysek, however, offers no teaching or suggestion to ameliorate the deficiency of Kim with respect to the underlying claim. Therefore, applicant respectfully submits that claim 1 is patentably distinguished over Kim and Hysek taken singly or in combination.

Claims 2-10 each depend either directly or indirectly from independent claim 1. These dependent claims are each separately patentable, but are offered as patentable for at least the same reasons as their underlying independent base claim. Therefore, applicant respectfully submits that all claims recite patentable subject matter and kindly solicits an early and favorable Notice of Allowability.

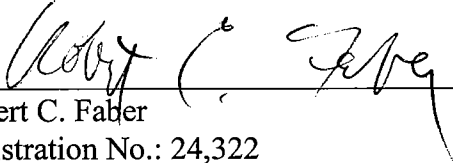
In the interest of brevity applicant has addressed only so much of the rejections as is considered sufficient to demonstrate the patentability of all claims. Applicant's failure to address any portion of the rejections should not be construed as acquiescence in the propriety of such

portions not addressed. Applicant maintains that the claims are patentable for reasons other than those specifically discussed, *supra*. If the Examiner has any reservation in allowing the claims, and believes that a telephone interview would advance prosecution, he is kindly requested to telephone the undersigned at his earliest convenience.

Respectfully submitted,

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